

Commentor No. 8: Richard Johnson

Comments on the Chemical and Metallurgical Research Building Replacement Project

I am pleased to submit these summary comments on the draft environmental impact statement (DEIS) for the Chemical and Metallurgical Research Building Replacement Project (the "CMRR").

Mission need: The DEIS purports that "these capabilities [that the CMRR will provide] are necessary to support the current and future directed stockpile work and campaign activities conducted at LANL [the Los Alamos National Laboratory]." This work is for the indefinite preservation of nuclear weapons, including the increasing likelihood of new-designs such as "mini-nukes" and the Robust Nuclear Earth Penetrator. This is contrary to the U.S.'s 1970 NonProliferation Treaty's obligation to "enter into serious negotiations leading to total nuclear disarmament...", repudiated in 2000 as an "unequivocal commitment." Further, it sets a terrible example of weapons of mass destruction to the rest of the world. As a key facility in this wrong direction the CMRR should be rejected.

Operations: The CMRR's primary role will be to directly support plutonium pit production at LANL through analytical chemistry and material characterization of special nuclear materials. The "No Action Alternative" of maintaining these operations at the existing CMR Building (with minimal repairs), and by extension conducting only limited pit production at LANL, is the best alternative action (as far as alternatives are given by the DEIS). DOE claims that expanded pit production is necessary, even though aging effects impacting nuclear weapons safety and reliability have never been found in pits up to 42 years of age. Further, the U.S. and Russia recently signed a treaty to reduce their deployed nuclear weapons to 2,200 each or under by 2013. Given the lack of aging effects and future reduced nuclear stockpiles expanded pit production is not necessary. It logically follows that the CMRR is not needed as well.

A TA-55 EIS: Some half dozen projects are planned in the near future for LANL's Technical Area-55, which is the site of the lab's pit production facility and the preferred location for the CMRR. Nevertheless, the DOE has rejected preparing a "TA-55 EIS." This is improper segmentation under the National Environmental Policy Act that the DOE should correct.

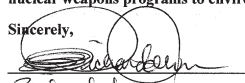
Costs: The DEIS fails to provide construction costs for the CMRR. In the past lab officials have stated that these costs could be up to \$955 million. These costs were revised down to \$600 million in the FY04 DOE budget, with a "savings" of some \$400 million due to a planned "design-build approach." DOE is notorious for overruns even when projects are thoroughly planned in advance, while the lab has been under intense scrutiny for alleged fiscal mismanagement. The CMRR final EIS should consider and disclose both construction and operational costs.

Risk analyses: The DEIS is deficient because of its failures to include risk analyses for wildfire (the Cerro Grande Fire!); terrorist incidences, including hi-jacked airplanes (pit production would be an attractive target!); criticality accidents; and the arbitrary use of a 50-mile radius for calculating accidental population doses (a 60-mile radius would more than double the population to some 700,000 potentially affected people).

The New CMRR Will be Riskier: DOE states that the most severe theoretical accident in the old CMR Building, a fire in the main plutonium vault, would result in two potential cancer deaths. The same scenario in the new CMRR would result in 7 potential cancer deaths, and its most severe theoretical accident (a building-wide spill in the event of an earthquake) would result in 84. This is a function of the 30-fold increase in the amount of plutonium to be stored in the new CMRR (around 13,200 lbs.) compared to the old CMR Building. This is in part due to the continuing consolidation at LANL of plutonium operations from across the country that the CMRR will help enable.

Conclusion: The CMRR should be rejected due to lack of mission need and the risks inherent to the facility. Further, the monies saved should be diverted from the continuing expansion of LANL's nuclear weapons programs to environmental restoration. Cleanup, not build-up!

Sincerely,



Richard Johnson

Date 6/27/03

Response to Commentor No. 8

- 8-1:** The NNSA notes the commentor's concerns about violations of the Non-Proliferation Treaty and his opposition to the CMRR Project. Continuing to provide the physical accommodations for CMR capabilities at LANL violates none of the terms of the referenced treaty. See response to Comment No. 6-3.
- 8-2:** The NNSA notes the commentor's preference for implementing the No Action Alternative. As discussed in Sections 1.1 and 1.3 of the *CMRR EIS*, the CMRR Facility would support a broad spectrum of research and development programs at LANL, including plutonium pit production
- 8-3:** As discussed in Section 1.3 of the *CMRR EIS*, AC and MC are fundamental capabilities required for the research and development support of DOE and NNSA missions at LANL. CMR Building operations and capabilities are currently being restricted in scope due to safety constraints; the building is not operated to the full extent needed to meet DOE/NNSA requirements established in 1999. The need for a new CMRR Facility exists, regardless of the decisions made about the size of the nuclear weapons stockpile, as long as the congressionally-assigned mission for NNSA remains the same.
- 8-4:** As discussed in some detail in Section 1.5 of the *CMRR EIS*, Integrated Nuclear Planning for facilities potentially located at TA-55 is a planning tool for effectively coordinating design and construction of distinct, stand-alone projects within the limited space available at TA-55. Each of these stand-alone projects moves through the NEPA compliance process on its own merits. Cumulative impacts of foreseeable activities at TA-55 and elsewhere at LANL are described in Section 4.8 of the *CMRR EIS*.
- 8-5:** As discussed in the response to Comment 6-10, cost is one of the factors that will be considered by decision makers in the Record of Decision. However, project costs are beyond the scope of this EIS, which focuses on evaluating potential environmental impacts of the Proposed Action and Alternatives.
- 8-6:** The *CMRR EIS* considered a facility-wide fire in its accident analyses (see Section C.4.1 of Appendix C for details). The consequences of such an accident occurring would be the same whether the initiator of such a fire was a wildfire, a process related fire, or a fire started for the purpose of terrorizing people. The NNSA has considered a terrorist act performed with a hi-jacked commercial jetliner and of a smaller plane crash due to

Commentor No. 8: Richard Johnson (Cont'd)

Response to Commentor No. 8

nonterrorist related reasons such as engine failure (see response 6-9 and 1-15). The probability of an event that would maximally engage all structures at TA-55 occurring is extremely small and, as NEPA analyses do not look to worst possible case accident scenarios, such an accident scenario has not been included in the *CMRR EIS*. However, potential wildfires and terrorists attacks are part of the considerations given to the security and safeguards analyses that facilitate building design specifications.

Criticality accidents are extremely unlikely and have small consequences relative to the low-frequency, high consequence accidents evaluated in the *CMRR EIS*. Text has been added to Section C.3.3 of Appendix C to clarify the reasons that criticality accidents were not included among the radiological accidents evaluated in detail.

The accident analyses performed for the *CMRR EIS* considered impacts to LANL's surrounding population out to a distance of 50 miles from the accident site because the concentration of radioactive materials decreases with increasing distance from the release point. For example, for an accident at TA-55, increasing the distance used in the calculation of radiological impacts from 50 miles to 80 miles increases the population under consideration from approximately 309,000 persons to over 1,021,000 persons. However, the corresponding radiological impacts on the population that could result from a fire in the main vault increase by only 7 percent. Conclusions concerning the radiological impacts of accidents on the population surrounding LANL would be the same whether the 50-mile distance or the 80-mile distance were used in the calculation.

- 8-7:** The new CMRR Facility would be operated at the expanded level decided upon for LANL operations through the Record of Decision issued based on the *LANL SWEIS* in 1999. The existing restricted operation of the CMR Building is reflected in the potential consequences of an extreme accident at that building, while the expanded level of operations proposed for the CMRR Facility is reflected in the potential consequences of an extreme accident occurring at the new facility. The CMRR Facility is not intended to enable consolidation of plutonium operations from across the DOE complex. It is intended to provide for ongoing AC and MC

Commentor No. 8: Richard Johnson (Cont'd)

Response to Commentor No. 8

capabilities at LANL. A small amount of laboratory space would be provided for incidental use by non-LANL entities.

- 8-8:** The NNSA notes the commentor's remarks regarding the rejection of the CMRR Project and diversion of funds for environmental restoration. The purpose and need for the Proposed Action are described in Sections 1.1 and 1.3 of the *CMRR EIS*. Funds allocated for the CMRR Project would not reduce funding for environmental restoration at LANL.

Commentor No. 9: Cathie Sullivan

From: Chris Mechels
Sent: Monday, June 30, 2003 8:27 AM
To: *CMRR EIS*
Subject: cmrr comments

Hello,
Please open the attached file for comments on the *CMRR EIS*. As you will note if you receive several copies of the same comments, they are the technical analysis of another person, Jay Coghlan, who is more knowledgeable on this particular issue than most of us.

My own comment relates to process on public EIS input. How discouraging it is to feel your input is entirely pro forma and without weight... like voting in the old USSR...one party on the ballot and victors decided before ballots are printed. For the present exercise, where nuclear policy comes to the public fully formed without benefit of public input I feel participation matters so that future decision-makers will know the size of the pile of bodies produced by their previous decision and moderate their pro nuclear goals. With Senator Domenici impervious to arguments against nuclear programs we who study this issue have never faced a playing field so steep. US nuclear policy grinds ahead with no regard for our own nuclear proliferant policies, treaties, health issues, or environmental impact. Surely this decision-making system is badly broken.

Cathie Sullivan

9-1

Response to Commentor No. 9

9-1: The NNSA notes the commentor's discouragement with the NEPA compliance process and with the process by which national nuclear policy is made. The NEPA compliance process comprises progressive steps undertaken by a Federal agency to meet legal requirements of the law, while the process for establishing national nuclear policy is a political one conducted by duly elected officials. Public participation in both processes occurs in different fashions. Public comments on the Draft *CMRR EIS* resulted in the revisions described in Section 1.9 and shown throughout the EIS by sidebars.

Commentor No. 9: Cathie Sullivan (Cont'd)

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Response to Commentor No. 9

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Commentor No. 9: Cathie Sullivan (Cont'd)

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Sincerely,
Cathie Sullivan

Date 30 June, 2003

9-9

Response to Commentor No. 9

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Commentor No. 9: Cathie Sullivan (Cont'd)

Response to Commentor No. 9

ongoing AC and MC capabilities at LANL. A small amount of laboratory space would be provided for incidental use by non-LANL entities.

- 9-9:** The NNSA notes the commentor's remarks regarding the rejection of the CMRR Project and diversion of funds for environmental restoration. The purpose and need for the Proposed Action are described in Sections 1.1 and 1.3 of the *CMRR EIS*. Funds allocated for the CMRR Project would not reduce funding for environmental restoration at LANL.

Commentor No. 10: Antonio Perez

Withers, Elizabeth

From: Antonio Perez
Sent: Thursday, May 22, 2003 3:08 PM
To: CMRR EIS
Subject: New CMR building

To Whom it may concern,

I work in Los Alamos for LANL, and I believe that a new CMR building is a good idea. As you probably already know the old building is over 50 years old. It was upgraded in the 90's but age has taken its toll. In my opinion a new build would increase the safety of the employees who work in the CMR. It would also increase the security of the material used and stored there. A new facility will also be cheaper and easier to maintain and operate.

On a side note I read an article on the LANL web site where a gentleman said something to the effect of "There wasn't a mission need" for a new CMR before and there is not one now. I strongly disagree. I believe a new building would increase safety, security and productivity at a building whose mission is very important to this country. Thank you very much for the chance to express my ideas on this subject.

Sincerely,
Antonio Perez

Response to Commentor No. 10

10-1

10-1: NNSA acknowledges the commentor's support for replacement of the existing CMR Building with a new facility.

10-2

10-2: NNSA acknowledges the commentor's recognition of the national need for a structure to house mission critical actinide chemistry and materials characterization work.

Commentor No. 11: Eva Marie Salas

Page 1 of 1

Withers, Elizabeth

From: Eva Marie Salas
Sent: Friday, June 20, 2003 1:52 PM
To: CMRR EIS
Subject: LANL

Dear Ms. Elizabeth Withers:
 I would like to express my opposition in relation to the chemistry and Metallurgy Research Replacement Project at Los Alamos National Laboratory, which would work with plutonium and uranium for nuclear weapons.

The continuation of the development of nuclear weapons violates the Nuclear Non-Proliferation Treaty which the U.S. renewed in 1995. The United States Constitution recognizes ratified treaties as "the supreme law of the land."

The numerous security breaches at Los Alamos National Laboratory renders the buildings and waste sites vulnerable to terrorists. This area is one of seismic activity as well, and at risk for an earthquake. Consequently, this is not a safe place to build and store nuclear weapons.

Thank you for giving my request your consideration.

Eva Marie Salas

|| 11-1

|| 11-2

|| 11-3

Response to Commentor No. 11

11-1: NNSA notes the commentor's opposition to the CMRR Project.

11-2: See responses to comments 6-1 through 6-3.

11-3: NNSA notes the commentor's concern's about LANL's vulnerability to terrorists and earthquakes. Nuclear weapons would not be built or stored at the existing CMR Building or the new CMRR Facility, although CMR activities would support maintenance of the nuclear arsenal. Security is a vital concern at LANL. As identified within a text box located in Section 1.1 of the *CMRR EIS*, NNSA provides a graded approach to safeguard SNM. Security systems employed at LANL include perimeter security and security fences, entry check-points for secure areas, building security (both intrusion and occupancy), and closed circuit television.

Commentor No. 12: Ann P. Ware

From: Ann P Ware
Sent: Friday, June 20, 2003 9:13 AM
To: CMRR EIS
Subject: The Chemistry and Metallurgy Research Replacement Project

To: Elizabeth Withers

Dear Ms. Withers,

This is not my first letter to you. As in earlier correspondence I am still strongly opposed to the continuing development of nuclear weapons. I do not know how effective the Nuclear Non-Proliferation Treaty is, but we have ratified it and renewed our ratification, and in my view our integrity depends on observing it. It is my understanding that the CMRR Project (despite its benign-sounding name) facilitates working with plutonium and uranium needed for developing nuclear weapons.

I deplore the increasing militarization of our nation and the enormous expenditures of public moneys that could be better spent on enhancing human life, not destroying it.

The production of nuclear weapons has proved to be disastrous to the health of workers, to say nothing of those affected by the environmental hazards this production and waste disposal cause.

Please count this letter as a strong objection to the CMRR Project.

Sincerely,

Ann P. Ware
590 East Lockwood
St. Louis, MO 63119

Response to Commentor No. 12

- 12-1:** The NNSA notes the commentor's continuing opposition to the development of nuclear weapons. See Response to Comment 6-3.
- 12-2:** The NNSA notes the commentor's opinions regarding militarization and money expenditures. However, the policies of the U.S. Armed Forces and the national defense budget are outside of the scope of this EIS, which focuses on evaluating environmental impacts of the Proposed Action and Alternatives. Chapter 4 of the *CMRR EIS* evaluates these potential impacts.
- 12-3:** The NNSA notes the commentor's beliefs that the production of nuclear weapons has been disastrous to worker health and those exposed to attendant environmental hazards. Potential environmental impacts that could result from implementation of the action alternatives are described in Chapter 4 of the *CMRR EIS*. Although nuclear weapons would not be produced under any of the alternatives evaluated in this EIS, activities under these alternatives would support maintenance of the Nation's nuclear arsenal. As discussed in Chapter 4, radiological risks and other environmental impacts expected under any of the alternatives would be small.
- 12-4:** The NNSA notes the commentor's objection to the CMRR Project.

Commentor No. 13: Concerned Citizens for Nuclear Safety, Joni Arends



107 Cienega St.
Santa Fe, NM 87501
505-986-1973 Tel
505-986-0997 Fax
ccns@nuclearactive.org
www.nuclearactive.org

June 30, 2003

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Elizabeth Withers
EIS Document Manager
Los Alamos Site Office
National Nuclear Security Administration
U.S. Department of Energy
528 35th Street
Los Alamos, NM 87544-2201

Dear Ms. Withers,

Enclosed please find 117 signed comment letters about the Draft Environmental Impact Statement for the Chemistry and Metallurgy Research Building Replacement Project (CMRR) at Los Alamos National Laboratory.

Concerned Citizens for Nuclear Safety (CCNS) has forwarded ten emails to you regarding the CMRR. We would appreciate your confirmation of receipt of these emails.

Thank you for your full consideration of these comments.

Sincerely,

Joni Arends
Executive Director

Enclosure

cc: Senator Jeff Bingaman Representative Heather Wilson
119 East Marcy Street 625 Silver Avenue
Santa Fe, NM 87501 Albuquerque, NM 87102

Senator Pete Domenici Representative Tom Udall
120 South Federal Place 811 St. Michael's Drive
Santa Fe, NM 87501 Santa Fe, NM 87505

Representative Steve Pearce
400 North Telshore, Suite E
Las Cruces, NM 88011

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Response to Commentor No. 13

Commentor No. 13: Concerned Citizens for Nuclear Safety

June 21, 2003

Elizabeth Withers
EIS Document Manager
Los Alamos Site Office
National Nuclear Security Administration
U.S. Department of Energy
528 35th Street
Los Alamos, NM 87544-2201

Dear Ms. Withers,

I submit the following comments on the Draft Environmental Impact Statement (Draft EIS) for the Chemistry and Metallurgy Research Building Replacement (CMRR) Project at Los Alamos National Laboratory (LANL), released by your agency in May 2003.

- NNSA claims that contaminated debris resulting from the disposition of the existing Chemistry and Metallurgy Research (CMR) Building will be stored or disposed of at either Technical Area-54 (Area G) or at an offsite commercial facility. However, the 1999 Site-wide EIS for LANL (LANL SWEIS) states that Area G likely will have reached capacity by 2009. Although NNSA does not intend to release a project-specific work plan for the disposition of the CMR for at least 15 years, a work plan should be drafted as soon as possible accounting for this discrepancy, specifying an offsite commercial waste facility, estimating the cost for disposition, estimating related air and water emissions, and occupational effects from disposition activities. This data should be included in the Final CMRR EIS.
- Although NNSA claims that the design/build approach may save upwards of \$450 million in construction costs, the Draft EIS includes neither a definition of the approach, nor provides actual cost estimates. This information should be included in the Final CMRR EIS.
- According to the Draft EIS, waste generation doubles, triples or even quadruples for the four Action Alternatives that NNSA is considering. This increase violates the Department of Energy's policy on pollution prevention, which requires facilities to reduce the volume of waste they create.
- NNSA argues that the CMRR is necessary to accommodate expanded CMR operations, which were selected as the Preferred Alternative for CMR operations in the Record of Decision for the LANL SWEIS. However, the LANL SWEIS specifies that more training in support of nuclear nonproliferation be included in expanded operations at the CMR. Nevertheless, the Draft EIS indicates that training for nonproliferation will be eliminated from LANL operations altogether. Should the CMRR project continue, nonproliferation training must be reinstated as an operations priority.

Thank you for your consideration of my comments.

Sincerely,

Signature

Name

Address

Response to Commentor No. 13

- 13-1:** The NNSA notes the commentor's concern that Area G would not accommodate waste from demolition of the existing CMR Building. The LANL SWEIS analyzed the expansion of the Area G footprint to allow for adequate LLW disposal capacity beyond the year 2009, and the associated Record of Decision issued in 1999 identified DOE's decision to proceed with the expansion of Area G accordingly. DOE also issued a Record of Decision in 2000 based on the *Waste Management Programmatic EIS (WM PEIS)* that stated that DOE had decided to continue to dispose of LLW onsite at LANL, to the extent practicable. Given the Area G expansion potential, waste generation reduction efforts of LANL, and judicious augmentation with offsite disposal at commercial sites when appropriate, it should be practicable to dispose of LLW at LANL for a long time into the future. As discussed in Section 3.12.4 of the CMRR EIS, LANL will expand disposal capacity sites for low-level waste in Area G to provide onsite disposal for an additional 50 to 100 years. Solid low-level waste can alternately be packaged for disposal at off-site licensed commercial facilities. It is unlikely that NNSA would wait up to 15 years to prepare a project specific work plan for the disposition of the CMR Building; but there is no urgent need to do so now, as any speculative estimates made prior to more thorough analyses would be of limited value when the time came to actually engage in the action. To the extent possible, bounding analyses of environmental impacts for the disposition of the CMR Building have been included in Section 4.7.2 of the CMRR EIS.

- 13-2:** See response 6-10.

Simplistically, the design/build approach to construction projects is one by which a single company is selected from those that submit bids to provide both the design for a building and then proceeds to actually construct that building. Project cost savings can be realized with this approach over the classic contracting approach having individual firms bid for the design of a building, with the selected firm then providing the design, and then having individual firms bid again for the construction of the designed structure, with the selected firm actually doing the building of the structure.

- 13-3:** The apparent jump in waste quantities (listed in Table S-3 of the Summary document) between the No Action Alternative and the action alternatives are a reflection of the status quo of the CMR Buildings

Commentor No. 13: Concerned Citizens for Nuclear Safety (Cont'd)

Individuals submitting this form letter:

John R. Acker	Irena Grygorowicz	Phyllis Montgomery	Dean Williamson
Matt Alexander	Linda H. Hardman	Carlos Mora	Natasha Williamson
Denise Arthur	Jonathan Hare	Ramona Morino	Keith R. Wuertz
Linda Aspenwind	Bob Harris	Amanda Murchison	John F. Young
Leslie Behn	Barry Hatfield	Frank E. Murchison	Nina Zelenunsky
Shama Beach	Ann Hendrie	Linda Naranjo-Huebl	Tiffin Zellers
Julie Bechko	Leah Hobgood	Margaret Nes	Cecile J. Zeigler
Michael Bechko	Nathan Houchin	David Nesbit	Alice Zorthian
Kathryn S. Becker	Douglas Hughes, M.D.	Renze Nesbit	
Deborah Beleck-Raynor	Tiffany Hunter	Shel Neymark	
Shirley A. Belz	Dorothy Jensen	Francesca Oldeni-Neff	
James T. Berry	Marge Johnson	Dennis Overman	
Stanley Beyrle	Alison Jones	Eileen Overman	
A.D. Bittson	Miles Jones	Michael T. Pacheco	
Peter Botting	Kate Keely	Claudia Parker	
Jan Boyer	Joy Kincaid	Robert E. Pearson	
Keri Boynt	Kim A. Kirkpatrick	Giselle Piburn	
Bill Brimjoin	Sheri Kotowski	Dave Pierce	
Mary Bronsteter	Tom Krozik	Steve Piersol	
Sarah Brooke Bishop	Alice K. Ladas	Peter Prandoni	
Mark W. Bundy	Leslie LaKind, D.D.S.	Jean Porteus	
Janet Burstein	Brad Landers	Robert Raynor	
Aaron B. Czerny	Shaphan Laos	Adam Read	
Clark Case	Jack Larson	Matthew Reen	
Karen Cohen	Rick Lass	Alan Reis, II	
Myles Courtney	James Latorie	Robert Romeo	
Kathy & Phil Dahl-Bredine	Lisa Law	A. Ronew	
Steve D. Dees	Pilar Law	Stanley Rosen	
Michele Desgroseilliers	Patricia A. Leahan	Lara A. Schwartz	
Jody C. Donaldson	R. Leland Lehrman	Paula Seaton	
Ann Eberlein	Andy Lilley	Robert Seton	
M. Jane Engel	Susannah H. Lippman	Michael Shorv	
Jay Ertel	Becky Lo Dolce	Raymond Singer, Ph.D.	
Barbara Ford	Ashana Lobody	Wendy Singer	
Bernadette Fernandez	Dale Lock	Shannyn Sollitt	
Sierra Fernandez	Jane Lumsden	J. Thea Spaeth	
Raymond Finck	Sue Shen Lyons	Jeff Spicer	
Dee Finney	Michael Mandell	Sonia Stromberg	
Bobbie Fleming	Tor Matson	Martin Suazo, Sr.	
Kimberly A. Foree	Dominique Mazeaud	Cathy Swedlund	
John & Diane Forsdale	Kristina McCarthy	Michael Thebo	
Antoinette Fox	M. Rachel McCarthy	Stephanie Thebo	
Colby Friend	Karen McClaren	Laura Thompson	
Graciela Garcia	& Marcia Naveau	Elizabeth Blythe Timken	
Jade Garcia	Anne McConnell	Aileen Torres-Hughes	
Myra Garcia	Beverly A. McCrary	Patrick L. Travers	
Percyne Gardner	Rita McElmury	Robin Urton	
David R. Genth	Eric McEuen	Jason P. Walsh	
Janice Gildea	Amy McFall	Sally J. Warnick	
Joe Gildea	Caitlin McKee	Deanna M. Watson	
Beth Ann Gillian	Christine McLorrain	Mark L. Watson	
Kathleen Ann Gonzalez	Lesley A. Michaels	Kimberly Webber	
Sally Goodknight	Celeste Miller	Melonie Weishuhn	
Matthew Goodro	Larry Miller	Michael Wiese	
Abraham J. Gordon	Ian Mioh	Michael Wiggs-West	
Patricia Griffin	Ignacio Montano	Amy Williams	

Response to Commentor No. 13

restricted operations and the Expanded Operations Alternative that DOE would pursue for LANL operations over the foreseeable future.

The projected waste generation volumes are bounding projections and do not take credit for pollution prevention reductions that would be expected to occur in the new CMRR Facility. Operation of the CMRR Facility would not violate the DOE's pollution prevented policy.

- 13-4:** Non-proliferation training would not be eliminated from LANL operations. As discussed in Section 2.4.7 of the CMRR EIS, not all capabilities either previously or currently conducted at the CMR Building, would be transferred into a new CMRR Facility. The activities identified in the CMRR EIS that would not move to the new CMRR Facility, including non-proliferation training, could continue to be conducted in the existing CMR Building if the necessary portions of that building are not decommissioned and demolished, or these activities could cease to be conducted anywhere at LANL. Other non-proliferation training activities and exercises conducted at various LANL facilities would not be affected by either the construction and operation of a new CMRR Facility or the decommissioning of the existing CMR Building. Many of these activities are planned for consolidation into a new building that was the subject of a 1999 environmental assessment (the Non-proliferation and International Security Center) identified as an action then under consideration in the LANL SWEIS referenced by the commentor (Chapter 1.6.3.1 of the SWEIS).

Commentor No. 14: Andy Brokmeyer

June 19, 2003

Elizabeth Withers
EIS Document Manager
Los Alamos Site Office
National Nuclear Security Administration
U.S. Department of Energy
528 35th Street
Los Alamos, NM 87544-2201

Dear Ms. Withers,

I submit the following comments on the Draft Environmental Impact Statement (Draft EIS) for the Chemistry and Metallurgy Research Building Replacement (CMRR) Project at Los Alamos National Laboratory (LANL), released by your agency in May 2003.

- NNSA claims that contaminated debris resulting from the disposition of the existing Chemistry and Metallurgy Research (CMR) Building will be stored or disposed of at either Technical Area-54 (Area G) or at an offsite commercial facility. However, the 1999 Site-wide EIS for LANL (LANL SWEIS) states that Area G likely will have reached capacity by 2009. Although NNSA does not intend to release a project-specific work plan for the disposition of the CMR for at least 15 years, a work plan should be drafted as soon as possible accounting for this discrepancy, specifying an offsite commercial waste facility, estimating the cost for disposition, estimating related air and water emissions, and occupational effects from disposition activities. This data should be included in the Final CMRR EIS.
- Although NNSA claims that the design/build approach may save upwards of \$450 million in construction costs, the Draft EIS includes neither a definition of the approach, nor provides actual cost estimates. This information should be included in the Final CMRR EIS.
- According to the Draft EIS, waste generation doubles, triples or even quadruples for the four Action Alternatives that NNSA is considering. This increase violates the Department of Energy's policy on pollution prevention, which requires facilities to reduce the volume of waste they create.
- NNSA argues that the CMRR is necessary to accommodate expanded CMR operations, which were selected as the Preferred Alternative for CMR operations in the Record of Decision for the LANL SWEIS. However, the LANL SWEIS specifies that more training in support of nuclear nonproliferation be included in expanded operations at the CMR. Nevertheless, the Draft EIS indicates that training for nonproliferation will be eliminated from LANL operations altogether. Should the CMRR project continue, nonproliferation training must be reinstated as an operations priority.

Thank you for your consideration of my comments.

Sincerely,

Signature

Name

Address

ANDY BROKMEYER

P.S. WE DONT NEED ANY MORE WEAPONS. YOU PEOPLE ARE INSANE! HOW CAN YOU SLEEP AT NIGHT?

Response to Commentor No. 14

14-1

14-1: See Response to Comment 13-1.

14-2: See Response to Comment 13-2.

14-3: See Response to Comment 13-3.

14-2

14-4: See Response to Comment 13-4.

14-3

14-5: The NNSA notes the commentor's opposition to construction of additional nuclear weapons. While the manufacture and use of nuclear weapons is a subject of continuing national and international debate, this debate is beyond the scope of the CMRR EIS, which focuses on evaluating potential environmental impacts of the proposed action and alternatives. Chapter 4 of the CMRR EIS evaluates these potential environmental impacts.

14-4

14-5

Commentor No. 15: Linda Hibbs

June 10, 2003

Elizabeth Withers
EIS Document Manager
Los Alamos Site Office
National Nuclear Security Administration
U.S. Department of Energy
528 35th Street
Los Alamos, NM 87544-2201

Dear Ms. Withers,

I submit the following comments on the Draft Environmental Impact Statement (Draft EIS) for the Chemistry and Metallurgy Research Building Replacement (CMRR) Project at Los Alamos National Laboratory (LANL), released by your agency in May 2003.

- NNSA claims that contaminated debris resulting from the disposition of the existing Chemistry and Metallurgy Research (CMR) Building will be stored or disposed of at either Technical Area-54 (Area G) or at an offsite commercial facility. However, the 1999 Site-wide EIS for LANL (LANL SWEIS) states that Area G likely will have reached capacity by 2009. Although NNSA does not intend to release a project-specific work plan for the disposition of the CMR for at least 15 years, a work plan should be drafted as soon as possible accounting for this discrepancy, specifying an offsite commercial waste facility, estimating the cost for disposition, estimating related air and water emissions, and occupational effects from disposition activities. This data should be included in the Final CMRR EIS.
- Although NNSA claims that the design/build approach may save upwards of \$450 million in construction costs, the Draft EIS includes neither a definition of the approach, nor provides actual cost estimates. This information should be included in the Final CMRR EIS.
- According to the Draft EIS, waste generation doubles, triples or even quadruples for the four Action Alternatives that NNSA is considering. This increase violates the Department of Energy's policy on pollution prevention, which requires facilities to reduce the volume of waste they create.
- NNSA argues that the CMRR is necessary to accommodate expanded CMR operations, which were selected as the Preferred Alternative for CMR operations in the Record of Decision for the LANL SWEIS. However, the LANL SWEIS specifies that more training in support of nuclear nonproliferation be included in expanded operations at the CMR. Nevertheless, the Draft EIS indicates that training for nonproliferation will be eliminated from LANL operations altogether. Should the CMRR project continue, nonproliferation training must be reinstated as an operations priority.

Thank you for your consideration of my comments.

Sincerely,

Signature

Name

Address

Linda Hibbs
Linda Hibbs

Note: I have been speaking at DOE hearings since the early 1980's. I believe our country's lead in developing nuclear weapons will now play out in a tragic way. Our current policy now encourages proliferation of nuclear weapons in other countries, and there is no way we can protect ourselves from their eventual use. Our country's power should be setting standards for their elimination. U.S. moral leadership is abysmally absent here, and I do not see it coming into our politics in the foreseeable future.

15-1

15-2

15-3

15-4

15-5

Response to Commentor No. 15

15-1: See Response to Comment 13-1.

15-2: See Response to Comment 13-2.

15-3: See Response to Comment 13-3.

15-4: See Response to Comment 13-4.

15-5: The NNSA notes the commentor's opposition to developing nuclear weapons. While the manufacture and use of nuclear weapons is a subject of continuing national and international debate, this debate is beyond the scope of the CMRR EIS, which focuses on evaluating potential environmental impacts of the proposed action and alternatives. Chapter 4 of the CMRR EIS evaluates these potential environmental impacts.

Commentor No. 16: Norma Jetté

June 29, 2003

Elizabeth Withers
EIS Document Manager
Los Alamos Site Office
National Nuclear Security Administration
U.S. Department of Energy
528 35th Street
Los Alamos, NM 87544-2201

Dear Ms. Withers,

I submit the following comments on the Draft Environmental Impact Statement (Draft EIS) for the Chemistry and Metallurgy Research Building Replacement (CMRR) Project at Los Alamos National Laboratory (LANL), released by your agency in May 2003.

- NNSA claims that contaminated debris resulting from the disposition of the existing Chemistry and Metallurgy Research (CMR) Building will be stored or disposed of at either Technical Area-54 (Area G) or at an offsite commercial facility. However, the 1999 Site-wide EIS for LANL (LANL SWEIS) states that Area G likely will have reached capacity by 2009. Although NNSA does not intend to release a project-specific work plan for the disposition of the CMR for at least 15 years, a work plan should be drafted as soon as possible accounting for this discrepancy, specifying an offsite commercial waste facility, estimating the cost for disposition, estimating related air and water emissions, and occupational effects from disposition activities. This data should be included in the Final CMRR EIS.
- Although NNSA claims that the design/build approach may save upwards of \$450 million in construction costs, the Draft EIS includes neither a definition of the approach, nor provides actual cost estimates. This information should be included in the Final CMRR EIS.
- According to the Draft EIS, waste generation doubles, triples or even quadruples for the four Action Alternatives that NNSA is considering. This increase violates the Department of Energy's policy on pollution prevention, which requires facilities to reduce the volume of waste they create. *It does not compromise national defense.*
- NNSA argues that the CMRR is necessary to accommodate expanded CMR operations, which were selected as the Preferred Alternative for CMR operations in the Record of Decision for the LANL SWEIS. However, the LANL SWEIS specifies that more training in support of nuclear nonproliferation be included in expanded operations at the CMR. Nevertheless, the Draft EIS indicates that training for nonproliferation will be eliminated from LANL operations altogether. Should the CMRR project continue, nonproliferation training must be reinstated as an operations priority.

Thank you for your consideration of my comments.

Sincerely,

Signature

Name

Address

Response to Commentor No. 16

16-1

16-1: See Response to Comment 13-1.

16-2: See Response to Comment 13-2.

16-3: See Response to Comment 13-3.

16-2

16-4: See Response to Comment 13-4.

16-3

16-5: The projected waste generation volumes are bounding projections and do not take credit for pollution prevention reductions that would be expected to occur in the new CMRR Facility. Operation of the CMRR Facility would not violate the DOE's pollution prevention policy. Implementation of DOE's pollution prevention policies would not compromise the national defense.

16-5

16-4

Commentor No. 17: Ross Lockridge and Ann Murray

June 29 2003

petition of two

Elizabeth Withers
EIS Document Manager
Los Alamos Site Office
National Nuclear Security Administration
U.S. Department of Energy
528 35th Street
Los Alamos, NM 87544-2201

Dear Ms. Withers,

I submit the following comments on the Draft Environmental Impact Statement (Draft EIS) for the Chemistry and Metallurgy Research Building Replacement (CMRR) Project at Los Alamos National Laboratory (LANL), released by your agency in May 2003.

- NNSA claims that contaminated debris resulting from the disposition of the existing Chemistry and Metallurgy Research (CMR) Building will be stored or disposed of at either Technical Area-54 (Area G) or at an offsite commercial facility. However, the 1999 Site-wide EIS for LANL (LANL SWEIS) states that Area G likely will have reached capacity by 2009. Although NNSA does not intend to release a project-specific work plan for the disposition of the CMR for at least 15 years, a work plan should be drafted as soon as possible accounting for this discrepancy, specifying an offsite commercial waste facility, estimating the cost for disposition, estimating related air and water emissions, and occupational effects from disposition activities. This data should be included in the Final CMRR EIS.
- Although NNSA claims that the "design/build approach may save upwards of \$450 million in construction costs, the Draft EIS includes neither a definition of the approach, nor provides actual cost estimates. This information should be included in the Final CMRR EIS. *No!*
- According to the Draft EIS, waste generation doubles, triples or even quadruples for the four Action Alternatives that NNSA is considering. This increase violates the Department of Energy's policy on pollution prevention, which requires facilities to reduce the volume of waste they create.
- NNSA argues that the CMRR is necessary to accommodate expanded CMR operations, which were selected as the Preferred Alternative for CMR operations in the Record of Decision for the LANL SWEIS. However, the LANL SWEIS specifies that more training in support of nuclear nonproliferation be included in expanded operations at the CMR. Nevertheless, the Draft EIS indicates that training for nonproliferation will be eliminated from LANL operations altogether. Should the CMRR project continue, nonproliferation training must be reinstated as an operations priority.

Thank you for your consideration of my comments.

Sincerely, *Ross Lockridge & Ann Murray*
Signature *Ross Lockridge & Ann Murray*
Name
Address

** Response Requested*

Response to Commentor No. 17

17-1

17-1: See Response to Comment 13-1.

17-2: See Response to Comment 13-2.

17-3: See Response to Comment 13-3.

17-4: See Response to Comment 13-4.

17-5: While cost is one of the factors considered by decision makers in the Record of Decision, a cost analysis is beyond the scope of the CMRR EIS, which focuses on evaluating potential environmental impacts of the proposed action alternatives. See Response to Comment No. 6-10.

17-5

17-2

17-3

17-4

Commentor No. 18: Elliott Skinner

June 8, 2003

Elizabeth Withers
EIS Document Manager
Los Alamos Site Office
National Nuclear Security Administration
U.S. Department of Energy
528 35th Street
Los Alamos, NM 87544-2201

Dear Ms. Withers,

I submit the following comments on the Draft Environmental Impact Statement (Draft EIS) for the Chemistry and Metallurgy Research Building Replacement (CMRR) Project at Los Alamos National Laboratory (LANL), released by your agency in May 2003.

- NNSA claims that contaminated debris resulting from the disposition of the existing Chemistry and Metallurgy Research (CMR) Building will be stored or disposed of at either Technical Area-54 (Area G) or at an offsite commercial facility. However, the 1999 Site-wide EIS for LANL (LANL SWEIS) states that Area G likely will have reached capacity by 2009. Although NNSA does not intend to release a project-specific work plan for the disposition of the CMR for at least 15 years, a work plan should be drafted as soon as possible accounting for this discrepancy, specifying an offsite commercial waste facility, estimating the cost for disposition, estimating related air and water emissions, and occupational effects from disposition activities. This data should be included in the Final CMRR EIS.

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According to the Draft EIS, waste generation doubles, triples or even quadruples for the four Action Alternatives that NNSA is considering. This increase violates the Department of Energy's policy on pollution prevention, which requires facilities to reduce the volume of waste they create.

NNSA argues that the CMRR is necessary to accommodate expanded CMR operations, which were selected as the Preferred Alternative for CMR operations in the Record of Decision for the LANL SWEIS. However, the LANL SWEIS specifies that more training in support of nuclear nonproliferation be included in expanded operations at the CMR. Nevertheless, the Draft EIS indicates that training for nonproliferation will be eliminated from LANL operations altogether. Should the CMRR project continue, Nonproliferation training must be reinstated as the operations priority.

Thank you for your consideration of my comments.

Sincerely,

Signature _____

Name _____

Address

I oppose all nuclear weapons. The CNR facility must be closed, as Rocky Flats was. LANL must be converted to work on non-proliferation (the example beginning at home) and elimination of all nuclear weapons. Environmental restoration must have a high priority. Sincerely, Stephen Schuman.

Response to Commentor No. 18

- 18-1:** See Response to Comment 13-1.

- 18-2:** See Response to Comment 13-2.

- 18-3:** See Response to Comment 13-3.

- 18-4:** See Response to Comment 13-4.

- 18-5:** The NNSA notes the commentor's opposition to all CMR activities except those that support nuclear non-proliferation. As discussed in Sections 1.1 and 1.3 of the CMRR EIS, AC and MC capabilities support a wide range of research and development activities at LANL, including non-proliferation training. Elimination of all CMR activities, except support for non-proliferation, would not fulfill NNSA's mission at LANL. The NNSA notes the commentor's opposition to nuclear weapons. Nuclear weapons would not be manufactured at the CMR Building or the new CMRR Facility.

- 18-6:** The NNSA notes the commentor's opposition to nuclear weapons. Although no nuclear weapons would be constructed in the existing CMR Building or the new CMRR Facility, CMR activities support maintenance of the nation's nuclear stockpile. The purpose and need for NNSA's Proposed Action is described in Section 1.3 of the CMRR EIS. Revision of the LANL mission to include only support for nuclear non-proliferation is outside of the scope of this EIS, which focuses on the evaluation of the environmental impacts that could result from implementation of the alternatives.

- 18-7:** The NNSA notes the commentor's support for environmental restoration at LANL. Implementation of the alternatives described in Chapter 2 of the CMRR EIS would not impact restoration efforts at LANL.